

BellSouth Telecommunications, Inc.
Legal Department

1600 Williams Street
Suite 5200
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner
General Counsel-South Carolina

803 401 2900
Fax 803 254 1731

May 16, 2005

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Generic Proceeding to Investigate Emergency Services Continuity Plans
Docket No. 2005-100-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of BellSouth Telecommunications, Inc.'s Petition to Intervene in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of the petition as indicated on the attached Certificate of Service.

Sincerely,



Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
DM5 #585529

RECEIVED
2005 MAY 16 PM 3:41
SO. CAROLINA
COMMISSION

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2005-100-C

IN RE:

Generic Proceeding to Investigate
Emergency Services Continuity Plans

PETITION TO INTERVENE

Pursuant to S. C. Code Regs. 103-836 and in compliance with the Notice of Generic Proceeding issued on April 19, 2005, BellSouth Telecommunications, Inc. ("BellSouth") respectfully petitions the Public Service Commission of South Carolina ("the Commission") for permission to intervene as a formal party of record in the above-captioned proceeding. In support of this Petition, BellSouth shows as follows:

1. BellSouth is a public utility presently providing comprehensive telecommunications services to its subscribers pursuant to intrastate tariffs approved by the Commission.

2. BellSouth's authorized representative in this proceeding is:

Patrick W. Turner
BellSouth Telecommunications, Inc.
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201
Email: patrick.turner@bellsouth.com
Telephone: (803) 401-2900
Facsimile: (803) 254-1731

FILED
2005 MAY 16 PM 3:41
SOUTH CAROLINA
COMMISSION

3. BellSouth has an interest in, and could be affected by, the Commission's rulings in this proceeding.

4. BellSouth has not yet fully developed its position in this proceeding.

5. Granting BellSouth's Petition will not cause any undue delay.

6. BellSouth reserves the right to testify and present evidence at the hearing in this proceeding. At this time, BellSouth does not know how much time would be required for such presentation.

WHEREFORE, based on the foregoing, BellSouth requests the following relief:

1. that it be allowed to intervene as a formal party of record in this proceeding by this Commission's granting its Petition to Intervene;

2. that any parties of record be directed to provide BellSouth with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding; and

3. that the Commission grant such other relief as it deems just and proper.

Respectfully submitted on this 16th day of May, 2005.



Patrick W. Turner
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR BELL SOUTH
TELECOMMUNICATIONS, INC.

STATE OF SOUTH CAROLINA

)

CERTIFICATE OF SERVICE

)

COUNTY OF RICHLAND

)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Petition to Intervene in Docket No. 2005-100-C to be served upon the following this May 16, 2005:

Florence P. Belser, Esquire
General Counsel
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211
(U. S. Mail and Electronic Mail)

F. David Butler, Esquire
Senior Counsel
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(U. S. Mail and Electronic Mail)

Jocelyn G. Boyd, Esquire
Staff Attorney
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
jocelyn.boyd@psc.sc.gov
(U. S. Mail and Electronic Mail)

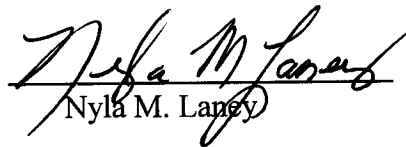
Joseph Melchers
Chief Counsel
S.C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(U.S. Mail and Electronic Mail)

RECORDED
2005 MAY 16 PM 3:41
SC PUBLIC SERVICE
COMMISSION

Stan Bugner
State Director
Suite 825
1301 Gervais Street
Columbia, South Carolina 29201
(Verizon South, Inc.)
(U. S. Mail and Electronic Mail)

Steve W. Hamm, Esquire
Richardson Plowden Carpenter & Robinson, P.A.
Post Office Box 7788
Columbia, South Carolina 29202
(Verizon South, Inc.)
(U. S. Mail and Electronic Mail)

John J. Pringle, Esquire
Ellis Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, South Carolina 29202
(NewSouth, NuVox, KMC, Xspedius)
(U. S. Mail and Electronic Mail)



Nyla M. Laney